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May 17, 2013

Jeff S. Jordan, Esq.
Federal Election Commission
Supervisory Attorney
Complaints Examination &
Legal Administration
999 E Street, NW
Washington, DC 20436

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OFFICE OF
C&M

Re: MUR 6724 Response of Guy Short/C&M Strategies, Inc.

Dear Mr. Jordan:

This response is submitted on behalf of Guy Short and C&M Strategies, Inc. (C&M) with respect to the February 28, 2013 letters sent by the Federal Election Commission (FEC or Commission) providing notice of the Complaint filed by Peter Waldron. A supplemental notice was provided by the Commission on April 1, 2013. The Complaint consists of unsubstantiated claims, many of which fail to articulate a violation of the law, and is wholly without merit. Accordingly, the Commission should find no reason to believe that Guy Short or C&M violated the Federal Election Campaign Act of 1971, as amended (FECA) and the Complaint against Guy Short and C&M should be dismissed.

Statement of Facts

Guy Short is a political consultant and longtime advisor to Congresswoman Michele Bachmann and her political committees. Mr. Short is the principal of C&M, a political consulting company organized under Colorado law on June 3, 2010 and based in Erie, Colorado. During 2011 and 2012, Mr. Short provided services to both Many Individual Conservatives Helping Elect Leaders Everywhere Political Action Committee (MichelePAC) and Bachmann for President (BFP). During 2011, Guy Short, through C&M, hired Iowa State Senator Kent Sorenson, through Grassroots Strategy, Inc. (Grassroots).

Response

The allegations contained in the Complaint are not supported by evidence, are unreliable, and are insufficient to trigger further Commission action. Guy Short and C&M were not involved in any unauthorized, improper or illegal activities related to Congresswoman Bachmann, BFP, or MichelePAC. In addition, Mr. Short is not aware of any improper or illegal activities related to Congresswoman Bachmann, BFP, or MichelePAC. In the Complaint, Mr. Waldron claims that there is an "agreement among and between Kent Sorenson, C&M Strategies, Inc., Guy Short and

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BFP and MichelePAC.” Compl. at 1. Mr. Short is unaware of any formal agreement between Kent Sorenson, C&M Strategies, Inc., Guy Short and BFP and MichelePAC. Mr. Short is aware of a verbal agreement between C&M and Grassroots.

MichelePAC and Bachmann for President

The Complaint implies it was improper for Mr. Short to provide services to both MichelePAC and BFP and that Mr. Short was paid by MichelePAC for work he performed on behalf of BFP. These allegations are false. Individuals are permitted to provide services to both leadership PACs and campaign committees at the same time, and to be compensated by both, so long as they are performing separate work for each committee and properly invoicing each committee. During 2011 and 2012, Mr. Short provided consulting services to both MichelePAC and BFP. At all times, Mr. Short was cognizant as to whether he was working for MichelePAC or BFP. The services Mr. Short provided to each of these committees was documented appropriately and properly invoiced. During December 2011 and January 2012, Mr. Short was paid by MichelePAC for a fundraising and research project, which was unrelated to his work for BFP. Mr. Short is not aware of any occasion when MichelePAC paid for services performed for BFP or vice versa.

Kent Sorenson

The Complaint alleges that BFP made a deliberate effort to conceal payments made to Mr. Sorenson. Although Mr. Short was not responsible for FEC compliance or reporting for MichelePAC or BFP, he is not aware of any attempt by MichelePAC or BFP to avoid FEC disclosure of payments made to Mr. Sorenson.

As part of the services provided to Congresswoman Bachmann and her political committees in 2011, Mr. Short, through C&M, retained the consulting services of Mr. Sorenson, through Grassroots. At all times, MichelePAC and BFP were aware Mr. Short was subcontracting with Mr. Sorenson. There is nothing illegal, improper, or unusual about a political consultant retaining the services of another political consultant. In fact, this arrangement is indistinguishable from thousands of other contractor/subcontractor or vendor/sub-vendor arrangements involving services provided to political committees.

Other Allegations

Conflict of interest is not covered by FECA and is outside the purview of the Commission. However, Mr. Short denies any conflict of interest arose while he provided services for MichelePAC and BFP. During 2011 and 2012, Mr. Short did not have organizational control of, or check-signing authority for, either MichelePAC or BFP.

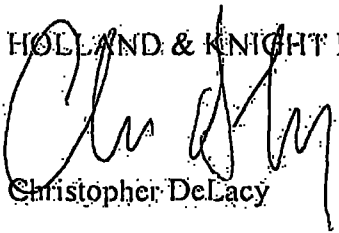
Jeff S. Jordan, Esq.
May 17, 2013
Page 3

Conclusion

The Complaint is unreliable and makes allegations against Mr. Short and C&M that are not based on any evidence. In some cases, the allegations contained in the Complaint do not articulate a violation of FECA. Based on the foregoing, I request that the Commission not take any action in this matter as it relates to Mr. Short and C&M.

Sincerely yours,

HOLLAND & KNIGHT LLP


Christopher DeLacy